

FTB:PP/SW
F. #2023R00528

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

QUANDELLE JOSEPH,

Defendant.

----- X

THE GRAND JURY CHARGES:

I N D I C T M E N T

Cr. No. 23-CR-306
(T. 18, U.S.C., §§ 201(b)(2)(C), 371,
981(a)(1)(C), 1791(a)(1), 1791(b)(3),
1791(b)(4), 1791(b)(5) and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

Judge Dora Lizette Irizarry
Magistrate Cheryl L. Pollak

COUNT ONE

(Conspiracy to Bribe a Public Official)

1. In or about and between December 2020 and January 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant QUANDELLE JOSEPH, together with others, did knowingly and willfully conspire to corruptly demand, seek, receive, accept and agree to receive and accept, directly and indirectly, something of value, to wit: United States currency, for a public official, to wit: JOSEPH, an employee of the Federal Bureau of Prisons ("BOP"), in return for JOSEPH to be induced to do and omit to do one or more acts in violation of the official duty of such official, contrary to Title 18, United States Code, Section 201(b)(2)(C).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant QUANDELLE JOSEPH, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about December 5, 2020, JOSEPH smuggled contraband to Co-Conspirator-1 (“CC-1”), an individual whose identity is known to the Grand Jury and who was an inmate at the Metropolitan Detention Center in Brooklyn, New York (the “MDC”), in exchange for United States currency.

(b) On or about January 25, 2021, JOSEPH sent a text message to Individual-1, an individual whose identity is known to the Grand Jury, requesting that Individual-1 give JOSEPH the money that CC-1 owed JOSEPH for smuggling contraband to CC-1.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Bribery of a Public Official)

3. In or about and between December 2020 and January 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant QUANDELLE JOSEPH, being a public official acting on behalf of an agency of the United States, to wit: the BOP, did knowingly, intentionally and corruptly demand, seek, receive, accept and agree to receive and accept, directly and indirectly, something of value, to wit: United States currency, in return for being induced to do and omit to do one or more acts in violation of the official duty of such official.

(Title 18, United States Code, Sections 201(b)(2)(C) and 3551 et seq.)

COUNT THREE
(Conspiracy to Bribe a Public Official)

4. In or about and between January 2021 and November 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendant QUANDELLE JOSEPH, together with others, did knowingly and willfully conspire to corruptly demand, seek, receive, accept and agree to receive and accept, directly and indirectly, something of value, to wit: United States currency, for a public official, to wit: JOSEPH, an employee of the BOP, in return for JOSEPH to be induced to do and omit to do one or more acts in violation of the official duty of such official, contrary to Title 18, United States Code, Section 201(b)(2)(C).

5. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant QUANDELLE JOSEPH, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) In or about January 2021, JOSEPH smuggled contraband into the MDC for Co-Conspirator-2 ("CC-2"), an individual whose identity is known to the Grand Jury and who was an inmate at the MDC.

(b) In or about January 2021, JOSEPH sent text messages to CC-2 that, among other things, advised CC-2 that a search of the MDC was imminent and that CC-2 should delete communications on his devices.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT FOUR
(Bribery of a Public Official)

6. In or about and between January 2021 and November 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant QUANDELLE JOSEPH, being a public official acting on behalf of an agency of the United States, to wit: the BOP, did knowingly, intentionally and corruptly demand, seek,

receive, accept and agree to receive and accept, directly and indirectly, something of value, to wit: United States currency, in return for being induced to do and omit to do one or more acts in violation of the official duty of such official.

(Title 18, United States Code, Sections 201(b)(2)(C) and 3551 et seq.)

COUNT FIVE

(Providing and Possessing Contraband in Prison)

7. In or about and between December 2020 and November 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant QUANDELLE JOSEPH did knowingly and intentionally, in violation of a statute and a rule and order issued under a statute, provide and attempt to provide one or more prohibited objects, to wit: marijuana, other controlled substances, cigarettes and cellular telephones, to inmates at the MDC.

(Title 18, United States Code, Sections 1791(a)(1), 1791(b)(3), 1791(b)(4), 1791(b)(5) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE THROUGH FOUR

8. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT
EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

QUANDELLE JOSEPH,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 201(b)(2)(C), 371, 981(a)(1)(C), 1791(a)(1),
1791(b)(3), 1791(b)(4), 1791(b)(5) and 3551 et seq., T. 21, U.S.C.,
§ 853(p), T. 28, U.S.C., § 2461(c))

A true bill.

True King

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Philip Pilmar and Sara Winik, Assistant U.S. Attorneys (718) 254-6106/6263